

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Joyce H. Drechen,

Case No. 0:22-cv-00705 (JRT/LIB)

Plaintiff,

vs.

**DEFENDANT RODENBURG LLP'S  
NOTICE OF SUPPLEMENTAL  
AUTHORITY**

Rodenburg LLP d/b/a  
Rodenburg Law Firm, and  
LVNV Funding LLC,

Defendants.

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Rodenburg LLP's Reply Memorandum (Doc. 28) filed May 16, 2022, asserts that the alleged distress over debt collection is insufficient to plausibly allege Article III standing. In *Nojovits v. Ceteris Portfolio Services, LLC*, No. 28-CV-2833, 2022 WL 2047179 (E.D.N.Y. June 7, 2022), the court held that the complaint's allegations of physical manifestations of emotional distress failed to plausibly allege concrete injury.

Dated: June 10, 2022

s/ Clifton Rodenburg  
Clifton Rodenburg (MN Bar #0092551)  
Amanda Lee (MN Bar #0396976)  
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